

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

**UNITED STATES OF AMERICA**

**v.**

**EDWARD CONSTANTINESCU,  
PERRY “PJ” MATLOCK,  
JOHN RYBARCZYK,  
GARY DEEL,  
STEFAN HRVATIN,  
TOM COOPERMAN  
MITCHELL HENNESSEY,  
DANIEL KNIGHT**

**Defendants.**

Case No. 22-CR-00612

**UNITED STATES’ UNOPPOSED MOTION FOR  
STIPULATED PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, the United States, by and through undersigned counsel, respectfully moves for a stipulated protective order governing discovery, and states in support thereof:

1. The indictment in this case charges the defendants with conspiracy to commit securities fraud in violation of Section 1349 and securities fraud in violation of Section 1348.
2. The discovery in this case contains sensitive, proprietary, and confidential financial and business information, the unprotected disclosure of which could create a substantial risk of harm to non-parties.

3. The parties have met and conferred regarding the proposed protective order, and the defendants do not oppose this motion and agree to the proposed protective order.

Wherefore, the United States respectfully requests that this Court enter the proposed stipulated protective order governing discovery.

Dated: January 18, 2023

Respectfully submitted,

GLENN S. LEON  
Chief, Fraud Section  
Criminal Division, Department of Justice

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was delivered by ECF to counsel of record for Defendants on January 18, 2023.

/s/ Scott Armstrong  
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